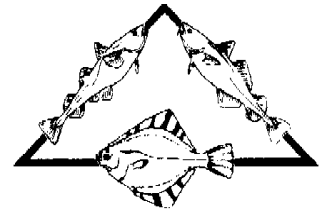


# Alaska Groundfish Data Bank

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North Pacific Fishery Management Council  
1007 West Third Ave., Suite 400  
Anchorage, AK 99501

RE: D2 – Programmatic Environmental Impact Statement (PEIS)

Dear Chairman Kinneen and Council members,

Alaska Groundfish Data Bank (AGDB) is involved in consulting, research, and the management of groundfish fisheries in the Gulf of Alaska, and whose members represent Kodiak-based trawlers and processors. AGDB appreciates the Ecosystem Committee’s work refining the purpose and need statement, as well as alternatives for the new programmatic EIS (PEIS). We agree with the committee recommendation that the Council initiate a Programmatic EIS to amend the management objectives, policies and procedures in all federal fisheries managed under MSA and the Halibut Act. We also believe that the Gulf of Alaska, Bering Sea and the Aleutian Island should be included in the new PEIS as well as the Arctic FMP/region.

## *Why include the Arctic*

One of the Council’s stated goals is to ensure that “The science-management interface meets the needs of current and future fisheries management, including evolving climate conditions...” Although no commercial fisheries occur in federal waters in the Arctic, small state-managed fisheries, personal use and subsistence fisheries may occur, although trends cannot be determined because of a lack of data. Additionally, as a result of climatic and ecosystem changes, traditional resident species of the Gulf of Alaska and/or Bering Sea may experience range shifts and migrations northward into the Arctic in search of more hospitable habitats. This possibility must be incorporated into a new comprehensive PEIS because of the potential fisheries impacts.

According to the Ecosystem Committee minutes following their May 8 meeting, “**The Committee agreed that the biological scope of the action should consider all fisheries for which we have Fishery Management Plans or regulations**” (emphasis in original, underline added). Additionally, the recommendation preamble asserts that a new PEIS “should encompass a scope beyond groundfish fisheries” and acknowledges the interconnectivity between “fisheries, species, and geographical areas.” Given the existence of an Arctic FMP and potential fisheries impacts due to climate change, if a new PEIS is purported to be holistic in its approach, the inclusion of the Arctic would seem to be a requirement.

Arguments against the inclusion of the Arctic include an increased workload or time requirements to complete. However, Alaskan fisheries are currently experiencing ecosystem changes driven by an evolving climate. The need to understand potentially significant and rapid changes in the Alaska EEZ already exists and will only increase in the future. Changes in species composition, abundance, and structure are of particular interest to stakeholders. Inclusion of the Arctic may also present opportunities for increased stakeholder engagement, such as increased collaboration on data collection and monitoring.

### *Purpose and Need Statement*

The Council should consider reviewing the purpose and need statement to clarify that the intent of the programmatic is to review current management, not make determinations about the adequacy of management prior to undertaking a review. Several statements in the purpose and need statement presuppose that specific actions are required. That is inconsistent with the goal behind a programmatic review to assess “if” changes are needed. For example, the purpose and need statement states “there is a need for fishery management policies and procedures to be more adaptable....” That may be true, but after review the Council may determine that many policies and procedures already provide the ability to adapt to challenges of climate change. Statements such as these make conclusions about the adequacy of current management before an assessment of management has been conducted. We suggest the Council review and not include conclusory statements in the purpose and need statement.

The purpose and need statement also includes three bullets that describe the potential focus for the review. Under the first bullet, regarding the rights and needs of Alaskan Tribes and communities (as well as resource-dependent communities), be more inclusive of non-subsistence resource users that benefit these types of stakeholders (e.g. CDQ, CQE and other programs via commercial fisheries).

Regarding the second bullet, we suggest a broader treatment of the issues under review rather than focusing only on limited access privilege programs that are already subject to extensive and continuous review requirements under the Magnuson-Stevens Act. We would like this to include other management actions under the purview of the Council. Maximum Retainable Amounts (MRAs), gear management, area closures and other actions should be broadly included to be better representative of what the Council manages and their intersections with changing climate conditions, instead of singling out LAPPs as a sole tool of the Council. We suggest rewording this bullet to read “Cumulatively, current management measures meet conservation and management objectives that are responsive to changing climate conditions.”

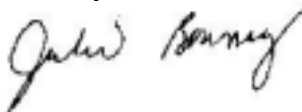
### *Alternatives*

We are aware that further specificity regarding the alternatives may occur during NEPA scoping. However, we would like to note that the current vague wording of the three alternatives needs to be revised.

By describing the second and third alternatives as more or less precautionary, the status quo is implied to be non-precautionary. People well informed of Alaska fisheries management understand that this is not the case. However, the public may notice this implication while being unaware of existing precautionary practices that address the conservation and the management of our fisheries such as the extensive observer and electronic monitoring programs, science-based quota setting processes, habitat protections, prohibited species management, and other measures in place to ensure sustainable use of resources.

We understand that developing a new PEIS is an iterative process and thank the Council and the Committee for their work thus far.

Sincerely,



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